

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Esther Salas  
v. : Crim. No. 15-570 (ES)  
CLIFFORD WARES :

This matter having come before the Court on the motion of the United States, dated November 12, 2015, by and through its attorney, Paul J. Fishman, United States Attorney for the District of New Jersey (Danielle Alfonzo Walsman and Meredith J. Williams, Assistant United States Attorneys, appearing) for an order safeguarding the identity and personal identifying information of the victims and other persons whose names appear in this case, including last names, addresses, and phone numbers with respect to all of the discovery in this matter (the "Discovery"), and restricting certain discovery material, meaning certain materials that the Government has determined contain sensitive victim information and should not be disclosed to the defendant outside the presence of his counsel (the "Protected Discovery")<sup>1</sup> and/or members of the general public; and for good cause shown;

IT IS on this 7<sup>th</sup> day of April 2016,

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<sup>1</sup> In accordance with this Protective Order, the Government has produced discovery materials on or about November 17, 2015, on or about November 19, 2015, on or about November 20, 2015, on or about December 30, 2015, and on or about March 30, 2016, to defense counsel in two categories: (1) "May be provided to Wares"; and (2) "May not be provided to Wares." The Protected Discovery refers only to those materials contained in the "May not be provided to Wares" category. On or about March 30, 2016, the Government produced a draft exhibit list, which delineated these categories for defense counsel.

HEREBY ORDERED that, pursuant to this Order, defense counsel shall securely maintain the Protected Discovery and disclose it only to his office staff, investigators, and anticipated fact or expert witnesses to the extent that defense counsel believes necessary to assist in the defense of his client in this matter, or as further provided in this Order;

IT IS FURTHER ORDERED that no party shall provide a copy of the Protected Discovery, or any portion thereof, to the defendant;

IT IS FURTHER ORDERED that the defendant shall receive access to review the Protected Discovery only under the supervision of defense counsel or another employee of defense counsel's office;

IT IS FURTHER ORDERED that defense counsel shall advise any person to whom the Protected Discovery is disclosed that such information should be held in strict confidence and that further disclosure or dissemination is prohibited without defense counsel's express consent;

IT IS FURTHER ORDERED that defense counsel shall obtain a certification, in the form attached hereto, from each person to whom the Protected Discovery is disclosed in which the recipient: (a) acknowledges the restrictions set forth in this Protective Order, and (b) agrees that he/she will not disclose or disseminate the Protected Discovery without the express consent of defense counsel. Defense counsel shall keep a copy of each certification to identify the individuals who received the Protected Discovery and the date on which such information was first disclosed. Defense counsel

agrees not to disclose the Protected Discovery to anyone who refuses to execute the certification;

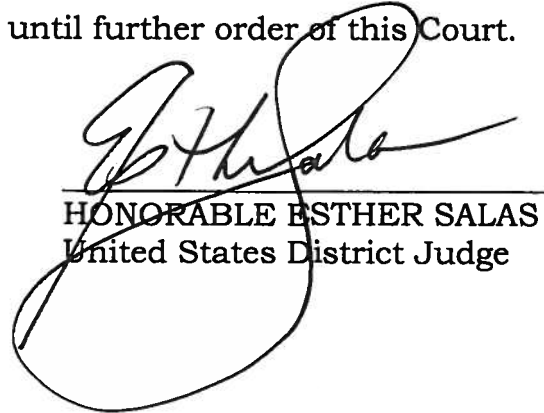
IT IS FURTHER ORDERED that to the extent the defendant already has copies of the Protected Discovery in his possession or any other materials revealing the identity and personal identifying information of the victims in this case, neither the defendant nor anyone acting on his behalf or at his request, may disseminate such information to anyone, including the general public, on the Internet, or in any other public forum;

IT IS FURTHER ORDERED that defense counsel, following the completion of this matter (including any appeal), will return the Protected Discovery to the Government or will destroy the Protected Discovery and confirm to the Government it has done so;

IT IS FURTHER ORDERED that the Government is permitted to redact identity and personal identifying information of the victims, their parents, and any other minor or victim whose name appears in this case, including last names, addresses, and phone numbers, addresses, birthdates, and contact information when producing the Discovery and Protected Discovery to defense counsel;

IT IS FURTHER ORDERED that this agreement and court order shall continue until further order of the court; and

IT IS FURTHER ORDERED that the Government's motion dated November 12, 2015, shall remain sealed until further order of this Court.



HONORABLE ESTHER SALAS  
United States District Judge

**CERTIFICATION**

I, \_\_\_\_\_, acknowledge that I have read the Court's  
(Name of Recipient)

Protective Order in the case of United States v. Clifford Wares 15-570 (ES). I

also have been advised by \_\_\_\_\_, that I will be viewing materials  
(Name of Counsel)

that contain protected information. I also have been advised that such information should be held in strict confidence, should only be used in connection with the investigation and trial preparation of this case and that further disclosure, dissemination or use is prohibited without defense counsel's express consent.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date